

Bradley, Megan

From: duke, gerallyn
Sent: Wednesday, July 27, 2016 7:26 PM
To: 'Sun, Xiaoyin'
Cc: Beach, James
Subject: RE: EPA Comments on Braskem Plan Approval

I'm sorry Xiaoyin, but I can't follow the NSR calculations. Please provide the revised review memo.

I need you to explain the basis for the claim that the facility is using PAE and not PTE for existing units and then go through, for each unit, the BAE and PAE or PTE. It seems to me that by the nature of the project being an expansion of throughput, the increase must be PTE. In other words, the whole project is to increase the PTE.

The pages references on your Response to Comments did not match the pages of the PDF file with the calculations. Reference to "other sections of Attachment C," which is 28 pages long, does not help me identify the baseline emissions or the PAE or PTE for the SPMT Ethylene Complex and the Braskem Flares. Where is the documentation for the PAE or PTE for the Railcar Cleaning Station and Baghouse?

We also need to discuss your responses to Comments 6 and 7.

I realize there is a need for expediency, but the lack of clarity makes it very difficult for me to conduct my review. I was out of the office when this arrived and did not return until yesterday. I am booked tomorrow, off Friday, and on travel Monday and Tuesday next week. Can we have a call on Wednesday, August 3rd, any time after 8 AM but not 10 to 11 AM or 2 to 3 PM? I suggest you use Outlook Scheduler to set up the call.

Thank you.

Gerallyn Duke
Office of Permits and State Programs
3AP10
EPA Region III
1650 Arch Street
Philadelphia, PA 19103
215-814-2084

From: Sun, Xiaoyin [mailto:xsun@pa.gov]
Sent: Wednesday, July 20, 2016 3:47 PM
To: duke, gerallyn <duke.gerallyn@epa.gov>
Cc: Beach, James <jamesbeach@pa.gov>; Campbell, Dave <campbell.dave@epa.gov>
Subject: RE: EPA Comments on Braskem Plan Approval

Hello Gerallyn,

Please see attached our response to your comments, and detailed emission calculations and explanations.

Please let me know if you have any questions.

Braskem is eager to obtain the Plan Approval. Could you let us know how long it will take EPA to review this response document?

Thanks.

Xiaoyin Sun | Engineering Specialist
Department of Environmental Protection
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5072 | Fax: 484.250.5921
www.depweb.state.pa.us

From: duke, gerallyn [<mailto:duke.gerallyn@epa.gov>]
Sent: Monday, June 27, 2016 6:38 PM
To: Sun, Xiaoyin
Cc: Beach, James; Campbell, Dave
Subject: EPA Comments on Braskem Plan Approval

Greetings Xiaoyin. We have completed our review of draft plan approval 23-0012C and provide our comments in the attachment. You and I discussed most of these comments last week; please note there is a new comment #7 in response to some internal review here. Because these comments include those that we consider to be significant, we request that this plan approval be processed sequentially. That means PADEP should return a revised, proposed plan approval and Response to Comments and revised review memo (as you deem appropriate) to EPA for a 45-day review. We will post "Day One" of the 45 -day review on [EPA's petition website](#) as the day we receive the proposed plan approval. Thank you for this opportunity to review this draft plan approval. As always, should you have any further questions or concerns about EPA's comments, please don't hesitate to contact me.

Gerallyn Duke
Office of Permits and State Programs
3AP10
EPA Region III
1650 Arch Street
Philadelphia, PA 19103
215-814-2084